

**From:** [Batson, David](#)  
**To:** [DeLuca, Kathryn](#); [Yeh, Alice](#)  
**Cc:** [Young, Robert](#); [Laura Bachle](#)  
**Subject:** OU2 - Additional Pages fo Attachments to Position Papers  
**Date:** Wednesday, June 24, 2020 4:52:11 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

---

Kate & Alice,

Following up on your question about potential duplicate documents among the ~800 that came in as attachments to PAP Position Papers.

We were able to establish an excel spreadsheet of all of the documents submitted by the PAPs to perform a search for duplicates with:

- similar titles
- the same publication dates
- the same amount of pages
- the same author
- or combinations of the above

We found that there were no duplicates of the previously submitted documents already in the repository, however, there was a total of **3,017** duplicate pages among the newly submitted documents. The duplicates were mostly individual pages of documents but also a few duplicate technical reports. I've flagged where the duplicate documents are being used to avoid rereading as I peruse the Position Papers and expert reports. I'll let Rob & ERG know to reduce our additional page total by 3,017 pages.

Please Be Safe,  
David



**David Batson, Esq. | Mediator & Allocation Specialist**

**a:** 1440 G Street, NW | Suite 8210 | Washington, DC 20005  
**e:** [david.batson@alterecho.com](mailto:david.batson@alterecho.com) | **w:** [www.alterecho.com](http://www.alterecho.com)  
**m:** 202.494.8702 | **p:** 202.499.6021

